



Connecticut Business & Industry Association

**TESTIMONY OF ERIC J. BROWN
ASSOCIATE COUNSEL
CONNECTICUT BUSINESS AND INDUSTRY ASSOCIATION
BEFORE THE
COMMERCE COMMITTEE**

March 16, 2010

Good afternoon. My name is Eric Brown and I am associate counsel with the Connecticut Business and Industry Association (CBIA). CBIA represents thousands of businesses of all sizes throughout Connecticut that provide hundreds of thousands of Connecticut citizens with good jobs and good benefits.

CBIA is pleased to have this opportunity to voice our support for

S.B. No. 453 (RAISED) AN ACT CONCERNING THE STATE'S REGULATORY CLIMATE; and

H.B. No. 5499 (RAISED) AN ACT CONCERNING THE PROMOTION OF BUSINESS

As you are well aware, Connecticut is facing an economic crisis as we continue to shed jobs, face staggering deficits and companies are becoming more open about Connecticut's competitiveness relative to other states. Something significant needs to be and done soon.

CBIA is grateful to this committee for raising these bills. They are part of a substantial effort this legislative session to improve Connecticut's regulatory climate and make our state attractive once again for investment and job creation.

We hope the Committee will continue its major contribution to this effort by doing all it can to bring these bills and others to successful passage this session.



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**H.B. No. 5499 (RAISED) AN ACT CONCERNING
THE PROMOTION OF BUSINESS**

CBIA strongly supports this bill as part of a package of proposals designed to improve our regulatory climate and send a message that Connecticut is moving quickly and decisively to make our state more attractive and welcoming to business investment and job creation.

This bill strengthens existing laws designed to reduce the regulatory burdens for small businesses. It changes the burden on regulatory agencies to "utilize" regulatory tools to help small businesses rather than "consider" using them. Further, with respect to the Department of Environmental Protection's (DEP's) water discharge permit program, section 2 of the bill would require DEP to exercise existing authority by adopting regulations that exempt certain categories of discharges from the requirement to submit detailed plans and specifications. This is a cumbersome, time-consuming and expensive component to DEP's permitting program that is unnecessary for most facilities. Adopting such regulations will help move the DEP towards a more "performance-based" approach to permitting whereby the Department focuses its efforts on enforcing compliance with discharge requirements rather than spending hundreds of staff hours on reviewing engineering plans and specifications.

To improve the bill, CBIA suggests 2 items:

First, a "delivery date" should be added as to when DEP needs to adopt the regulations referenced in the current bill. We recommend December 31, 2010.

Second, the bill should add a provision that the regulations shall provide the exemption for detailed plans and specifications along with other expedited permitting measures for permit renewals where the facility has not substantially changed its operations and has a good compliance record over the period of the existing permit.

Thank you very much again for moving this bill forward and we strongly urge your support for HB-5499.



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**S.B. No. 453 (RAISED) AN ACT CONCERNING THE STATE'S
REGULATORY CLIMATE**

CBIA has some concerns with the bill in its current form

CBIA is concerned about the intent of this bill in that it offers no guidance as to the specific challenges presented by our current regulatory climate and, to whatever aspects the study does wind up focusing on, the bill calls for a report to be provided by February 1, 2012.

This language does not reflect the immediacy of the crises we currently face in Connecticut. We simply don't have 2 years to wait for a study that may result in positive action in the months or years to follow.

The legislature needs to take action NOW – THIS SESSION to make significant changes and send a signal to the rest of the country that as the national economy begins to recover, Connecticut is open for business and wants businesses to come and thrive here.

Accordingly, CBIA strongly urges this committee to focus on the significant task at hand. There are many bills currently being considered in this and other committees that will make a difference and send a clear signal right away. For example, SB-174 was scheduled for a vote in your committee this morning and HB- is awaiting your action.

CBIA thanks the committee for its recognition that problems with our regulatory climate need to be addressed NOW.

For that reason, we urge the committee to assign specific issues to be studied in the PRI report and require that the study be completed in time for legislative action next session.

Thank you for this opportunity to provide comment.